



Via Electronic Filing

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Marlene H. Dortch
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Subject: **ET Docket No. 21-48, Acconeer Request for Waiver**

Volvo Car Corporation (“Volvo Cars”) appreciates the opportunity to submit comments in response to the Acconeer AB (“Acconeer”) request for waiver, docketed in ET Docket No. 21-48.

Information About Volvo Cars

Volvo Cars is a premium global mobility provider from Sweden best known for being a world leader in automotive safety and quality Scandinavian design. Over the past decade Volvo Cars has undergone a global transformation, with a completely renewed product portfolio, repositioned brand, and truly global footprint – including a U.S. manufacturing facility in Ridgeville, South Carolina. In that time, Volvo Cars has nearly doubled its sales volume and today competes with global premium rivals.

Volvo Cars has been the automotive safety leader since its founding in 1927. Its ground-breaking technologies – such as the 1959 invention of the three-point safety belt that is standard in all cars today – have saved millions of lives around the world. As Volvo Cars moves into the next phase of its transformation, the company has laid out an ambitious sustainability vision, with a bold goal to become climate-neutral by 2040.

Volvo Car’s Comments on Acconeer’s Waiver Request

Volvo Cars supports the waiver request from Acconeer, and the other requests from Tesla, Vayyar, Valeo and Infineon regarding operation in the 57-71 GHz band at higher power levels than stipulated in section 15.255.

Volvo Cars believes that the use of “short-range devices used for interactive motion sensing” under Section 15.255(a)(2), can enable the innovation in the areas of safety and sustainability, for example in the use cases like occupant reminder, seatbelt reminder, theft prevention systems, supporting advanced airbag systems, and gesture based access control systems.

Volvo Cars also states that its preferred option would be to update the 15.255 rules and increase the allowed peak power level to 13 dBm EIRP for “short-range devices used for interactive motion sensing” to the complete 57-71 GHz band. This would be a way of improving safety in



the automotive industry, thus promoting innovation and competition between a broader range of vendor solutions.

Volvo Cars would be pleased to discuss our comments in further detail. If you need any additional information or have any questions, please do not hesitate to contact me at kyehl@volvocars.com.

Respectfully,

Katherine H. Yehl

Katherine Yehl
Vice President Government
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